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Attorneys for Defendants NEW HAVEN
UNIFIED SCHOOL DISTRICT, ABHI BRAR,
CHRIS PERRY, ANGELA HIGGERSON, and
KENNETH PANDO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

J.F. a minor, by her Guardian ad Litem
CHERISE ABEL-IRBY,

Plaintiff,

vs.

NEW HAVEN UNIFIED SCHOOL
DISTRICT, ABHI BRAR, CHRIS PERRY,
ANGELA HIGGERSON, KENNETH
PANDO and DOES 1-20,

Defendants.

CASE NO. C 13-03808 SI (EDL)

**NOTICE OF CONDITIONAL
SETTLEMENT; WAIVER OF
RESPONSIVE PLEADING DEADLINE
AND WITHDRAWAL OF PENDING
MOTIONS**

The Hon. Susan Illston

Trial Date: June 22, 2014

TO THE COURT:

The parties participated in a mediation and entered into a conditional settlement agreement on January 5, 2015. The settlement would dispose of the entire case and is conditioned upon approval by the New Haven Unified School District Board of Education who will consider the agreement at its next regularly scheduled meeting on January 20, 2015. Payment under the agreement and the parties' stipulation to dismiss is then anticipated on or before March 23, 2015.

Trial in this matter is set for June 22, 2015.

Pursuant to the tentative settlement, the parties jointly request the following:

1. Defendant District be relieved of its obligation to respond to the amended complaint filed on December 22, 2014;

2. Defendants' pending motions for (1) Motion for Discovery Sanctions [Docket No. 121], (2) Motion to Remove Guardian ad Litem Cherise Abel-Irby [Docket No. 155], (3) Motion for Leave to File Motion for Reconsideration [Docket No. 158] and (4) Motion to Compel Compliance By W. Renee Martin with Defendant's Subpoena to Produce Documents [Docket No. 167] be withdrawn and otherwise taken off-calendar.

3. The Court set a deadline for the filing of the dismissal of April 1, 2015 and continue the case management conference, currently set for March 18, 2015 to April 3, 2015.

DATED: January 6, 2015

LAW OFFICES OF NICOLE HODGE AMEY

By: /s/ Nicole Hodge Amey
Nicole Hodge Amey
Attorneys for Plaintiff JF

DATED: January 6, 2015

FAGEN FRIEDMAN & FULFROST, LLP

By: /s/ Kimberly A. Smith
Kimberly A. Smith
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CHRIS PERRY, ANGELA HIGGERSON, and
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PANDO and DOES 1-20,

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CASE NO. C 13-03808 SI (EDL)

~~PROPOSED~~ ORDER GRANTING
WAIVER OF RESPONSIVE PLEADING
DEADLINE AND WITHDRAWAL OF
PENDING MOTIONS

The Hon. Susan Illston

Trial Date: June 22, 2014

Having received the notice of conditional settlement from the parties to this action, the
Court orders the following actions:

1. Defendant District is relieved of its obligation to respond to the amended complaint
filed on December 22, 2014;


2. Defendants' pending motions for (1) Motion for Discovery Sanctions [Docket No.
121], (2) Motion to Remove Guardian ad Litem Cherise Abel-Irby [Docket No. 155], (3) Motion
for Leave to File Motion for Reconsideration [Docket No. 158] and (4) Motion to Compel
Compliance By W. Renee Martin with Defendant's Subpoena to Produce Documents [Docket No.
167] are withdrawn and otherwise taken off-calendar.

C 13-03808 SI (EDL)

~~PROPOSED~~ ORDER GRANTING WAIVER OF RESPONSIVE PLEADING DEADLINE AND WITHDRAWAL
OF PENDING MOTIONS

1 3. The case management conference, currently set for March 18, 2015 is continued to
2 April 3, 2015 at 9:00 a.m. It is expected that the parties will file their joint notice of dismissal
3 prior to that date.

4
5 DATED: January 6 , 2015

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8 By: 
9 Susan Illston
10 Judge of the United States District Court

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